

Robert J Vanden Bos OSB #78100
Douglas R. Ricks, OSB #044026
Christopher N. Coyle, OSB #07350
Spencer C. Wilson, OSB #154498
VANDEN BOS & CHAPMAN, LLP
319 S.W. Washington, Suite 520
Portland, Oregon 97204
TELEPHONE: (503) 241-4869
FAX: (503) 241-3731

Of Attorneys for Debtor-in-Possession

IN THE UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF OREGON

In re) Case No. 16-30406-rld11
)
SeaPort Airlines, Inc.,) DEBTOR'S MOTION TO LIMIT NOTICE OF
) INTENT TO SELL CERTAIN AIRPLANE PARTS
) LOCATED IN JUNEAU, ALASKA
Debtor-in-Possession.)

Debtor moves the court for an order limiting notice of the Debtor's Notice of Intent to Sell Certain Airplane Parts Free and Clear of Liens to the 20 largest unsecured creditors, members of the Unsecured Creditors Committee, all secured creditors; all governmental entity creditors and those parties who have requested special notice.

In support of this motion, Debtor respectfully represents:

1. There are approximately 600 creditors in the case and sending notice to all such creditors is not necessary and would be unduly expensive;
2. The Unsecured Creditors Committee and the United States Trustee do not oppose the Debtor's motion to limit notice as requested herein;

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VANDEN BOS & CHAPMAN, LLP
Attorneys at Law
319 SW Washington Street, Suite 520
Portland, Oregon 97204-2690--(503) 241-4869

3. The terms of the sale, as detailed in the Notice of Intent to Sell Certain Airplane Parts Located in Juneau, Alaska, provide the Court and the creditors with sufficient information as to the reasonableness of the sale price.

Respectfully submitted;

VANDEN BOS & CHAPMAN, LLP

By:/s/Robert J Vanden Bos

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Of Attorneys for Debtor-in-Possession

In re SeaPort Airlines, Inc.;
Chapter 11 Bankruptcy Case No. 16-30406-rld11

CERTIFICATE - TRUE COPY

DATE: May 19, 2016

DOCUMENT: DEBTOR'S MOTION TO LIMIT NOTICE OF INTENT TO SELL
CERTAIN AIRPLANE PARTS LOCATED IN JUNEAU, ALASKA

I hereby certify that I prepared the foregoing copy of the foregoing named document and have carefully compared the same with the original thereof and it is a correct copy therefrom and of the whole thereof.

CERTIFICATE OF SERVICE

I hereby certify that I served a copy of the foregoing on:

SeaPort Airlines, Inc. Attn: Timothy Sieber 816 SW First Avenue Portland, Oregon 97204	Michael J. Edelman VEDDER PRICE 1633 Broadway, 47th Floor New York, New York 10019	Dan McAllister Treasurer-Tax Collector Attention: Bankruptcy Desk 1600 Pacific Highway, Room 162 San Diego, California 92101
Franklin C. Adams POB 1028 Riverside, CA 92502-1028	Tulare County Tax Collector Attn Jorge Garcia Deputy Tax Collector 221 S Mooney Blvd Rm 104-E Visalia, CA 93291-4593	
Mark J. Wolfson 100 N Tampa St #2700 Tampa, FL 33602		

by mailing a copy of the above-named document to each of them in a sealed envelope, addressed to each of them at his or her last known address. Said envelopes were deposited in the Post Office at Portland, Oregon, on the below date, postage prepaid.

I hereby certify that the foregoing was served on all CM/ECF participants through the Court's Case Management/Electronic Case File system on the date set forth below.

Dated: May 19, 2016

VANDEN BOS & CHAPMAN, LLP

By:/s/Douglas R. Ricks for Robert J Vanden Bos
Robert J Vanden Bos, OSB #78100
Douglas R. Ricks, OSB #044026
Christopher N. Coyle, OSB #07350
Of Attorneys for Debtor-in-Possession